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Attorneys for Defendants
CITY OF SACRAMENTO, SACRAMENTO
POLICE DEPARTMENT, DANIEL HAHN,
DARBY LANNOM, and VINCENT CATRICALA

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

PHAYJJON MCCLELLAN,
Plaintiff,
vs.
CITY OF SACRAMENTO, et al.,
Defendants.

Case No. 2:20-cv-00560-TLN-KJN

**JOINT STIPULATION FOR
MODIFICATION OF
SCHEDULING DEADLINES;
ORDER**

Pursuant to Fed. R. Civ. P. 16(b)(4), the parties—Plaintiff Phayjjon McClellan (“Plaintiff”) and Defendants City of Sacramento, Sacramento Police Department, Daniel Hahn, Darby Lannom, and Vincent Catricala (collectively, “Defendants”)—submit the following stipulation for modification of the currently-applicable scheduling deadlines in this case, for the purpose of facilitating the competition of discovery.

STIPULATION

WHEREAS, on May 11, 2020, the parties agreed to the following scheduling deadlines in this matter:

- Fact Discovery Cut-Off Date: February 12, 2021
- Expert Disclosure Date: March 12, 2021
- Rebuttal Expert Disclosure Date: April 9, 2021
- Expert Discovery Cut-Off Date: May 14, 2021
- Dispositive Motions Filed By: June 11, 2021

(ECF No. 13 at 2);

WHEREAS, on December 11, 2020, the Court granted Plaintiff's motion to compel responses to various requests for *Monell*-based discovery;

WHEREFORE, the parties' counsel have conferred and agreed to a six-month extension of the scheduling deadlines in this matter, in order to facilitate the competition of discovery, where outstanding discovery remains to be completed and counsels' further meet-and-confer efforts are anticipated;

NOW THEREFORE, the parties agree and stipulate that:

The currently-applicable scheduling deadlines (ECF No. 13 at 2) be MODIFIED as follows:

- Fact Discovery Cut-Off Date: August 12, 2021
- Expert Disclosure Date: September 13, 2021
- Rebuttal Expert Disclosure Date: October 11, 2021
- Expert Discovery Cut-Off Date: November 15, 2021
- Dispositive Motions Filed By: December 13, 2021

IT IS SO STIPULATED.

Dated: January 4, 2021

Respectfully Submitted,
LAW OFFICE OF MARK E. MERIN

/s/ Mark E. Merin

By: _____

Mark E. Merin
Paul H. Masuhara

Attorney for Plaintiff
PHAYJON MCCLELLAN

1 Dated: January 4, 2021

Respectfully Submitted,
CITY OF SACRAMENTO

2
3 /s/ Andrea M. Velasquez
(as authorized on January 4, 2021)

4 By: _____
5 Susana Alcala Wood
Andrea M. Velasquez

6 Attorneys for Defendants
7 CITY OF SACRAMENTO, SACRAMENTO
POLICE DEPARTMENT, DANIEL HAHN,
8 DARBY LANNOM, and VINCENT CATRICALA

9
10
11 **ORDER**

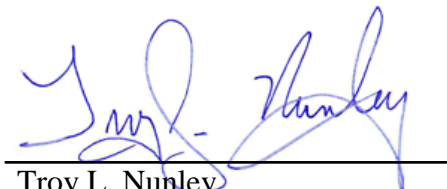
12 GOOD CAUSE APPEARING, the parties' stipulation is GRANTED.

13 The currently-applicable scheduling deadlines in this matter are MODIFIED as follows:

- 14 • Fact Discovery Cut-Off Date: August 12, 2021
15 • Expert Disclosure Date: September 13, 2021
16 • Rebuttal Expert Disclosure Date: October 11, 2021
17 • Expert Discovery Cut-Off Date: November 15, 2021
18 • Dispositive Motions Filed By: December 13, 2021

19 IT IS SO ORDERED.

20 DATED: January 5, 2021

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22 _____
Troy L. Nunley
United States District Judge